

Exhibit E

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION
4 MICHAEL DAVID SILLS and §
5 MARY SILLS, §
6 §
7 Plaintiffs, § CASE NO.:
8 §
9 Vs. § 3:23-cv-00478
10 §
11 SOUTHERN BAPTIST CONVENTION, §
12 a non-profit corporation; §
13 et al., §
14 §
15 Defendants. §

16 *****
17 ORAL AND VIDEOTAPED DEPOSITION OF
18 CHRISTOPHER "BART" BARBER
19 6th day of December, 2024
20 *****

21 Job No. 7047522
22
23
24
25

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1 because I was unable to find them.
2 A. I -- I can't imagine. The only times
3 I'd ever deleted a tweet were if I misspelled
4 something that I deleted it to put another tweet
5 up.
6 Q. So you didn't delete anything that was
7 responsive to this lawsuit being filed.
8 A. No.
9 Q. Okay. How many followers do you have on
10 Twitter?
11 A. Right now?
12 Q. Yes, sir.
13 A. More than 25,000. I don't know how many
14 I have.
15 Q. What did you have back in 2022?
16 A. I have no idea.
17 Q. Think. I mean guess. I'm not asking
18 you for particular number, but did you have 5,000,
19 50,000?
20 A. I don't think I've ever had 50,000. I
21 would guess that I had more than 5,000, and you
22 said 2022?
23 Q. Yes, sir.
24 A. Okay. I -- so I'll just tell you. I
25 started blogging in 2006, and looking to see how

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1 many people had read something that I wrote was bad
2 for me. I liked to see that a lot of people read
3 what I wrote, and I stopped looking at things like
4 that because --
5 Q. Is it fair to say you --
6 A. -- it would be prideful.
7 Q. -- you had anything between 5 and 25,000
8 back in 2022?
9 A. Yeah. I would say that's probably
10 right.
11 Q. Okay.
12 A. I mean --
13 THE REPORTER: Slow down, everybody.
14 THE WITNESS: I'm so sorry. I'm so
15 sorry.
16 A. I would guess that I had around 20,000
17 maybe.
18 BY MS. RILEY:
19 Q. I'm not trying to hold you. I'm just
20 trying to see if --
21 A. I --
22 Q. -- you have a general idea of how many
23 followers you had.
24 Okay. Now let's get into your tweets.
25 A. Okay.

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A horizontal bar chart with 15 categories on the y-axis. The x-axis represents numerical values. Most categories have long bars, indicating high values. Categories 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, and 15 have very short bars, indicating low values.

Category	Value
1	~10
2	~10
3	~10
4	~10
5	~10
6	~10
7	~10
8	~10
9	~10
10	~10
11	~10
12	~10
13	~10
14	~10
15	~10

1 number I just called out that ends in 617. The
2 next one is LYELL_00349031. The next one is
3 LYELL_00349570. The next one is 00348748, and the
4 last one is LYELL_00348466.

5 (Witness reviews document.)

6 A. Okay.

7 BY MS. RILEY:

8 Q. Okay. Can you tell me what that
9 document is that I've just handed you?

10 A. It's a multipage document that presents
11 a thread of tweets that I posted on Twitter along
12 with some people's replies.

13 Q. So you don't dispute that these were
14 screenshotted or taken from your email thread -- I
15 mean your tweet thread?

16 A. I'll stipulate that I wrote all of this.

17 Q. Okay. All right. And on the first one
18 on the first page, it shows that an @JenLyell was
19 tagged?

20 A. Yes. Yes, that I'm replying to -- I'm
21 replying to a tweet that mentioned her.

22 Q. Okay.

23 A. And that mentioned me.

24 Q. So that means that all of her followers
25 saw your response; is that correct?